

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)
[Enter your name, address and telephone number]

In Re:

Dominic Forte

Case No.: 17-28799

Chapter: 13

Hearing Date: _____

Judge: JNP

MOTION TO IMPOSE THE AUTOMATIC STAY UNDER 11 U.S.C. § 362(c)(4)
CERTIFICATION OF DOMINIC FORTE

I, Dominic Forte, Debtor in the above captioned case, submits this Certification in support of the Motion to Impose the Automatic Stay filed by me on September 15th, 2017.

The Debtor through his undersigned Counsel humbly requests that this Honorable Court grant the Debtor's Motion to Impose the Automatic Stay, and Avers the following.

1. Dominic Forte, hereinafter referred to as "Debtor," filed for relief under Chapter 13 as a pro-se Debtor on April 18th, 2017.
2. He filed pro-se at the request of "a loan modification group" he had been working with, in order to save his residence located and known as 2117 S. Brighton Avenue, Lindenwold, NJ 08021.
3. Being without Counsel, the Debtor was unaware of his pre-filing Credit Counseling requirement, as well as complying with the deadlines to file his Schedules, Statements and related documents.
4. On or about May 3rd, 2017 this Honorable Court dismissed Debtor's Bankruptcy due to the Debtor's failure to comply with the Court's deadlines and the Debtor's failure to file his required documents.

6. The loan modification did not come into fruition and the Debtor was advised to file a subsequent bankruptcy on July 17th, 2017.
7. The 2nd bankruptcy filed as pro-se was assigned case number 17-24426JNP.
8. On or about August 1st, 2017 this case was dismissed for failure of the Debtor again to file his necessary documents as required.
9. The Debtor has completed on July 20th, 2017 a Certificate of Pre-Filing Credit Counseling.
10. The Debtor is currently facing a Sheriff sale of his family's residence on September 20th, 2017.
11. Thankfully, Debtor realized that he was miss-lead as to the complexities of filing a bankruptcy case and therefore sought counsel.
12. The undersigned counsel was retained on September 15, 2017.
13. This current Bankruptcy was filed in good faith, and deserving of the imposition of the Automatic Stay.
14. The Debtor has Counsel that will ensure that all Bankruptcy deadlines are timely met.
15. Additionally, the Debtor has a savings of approximately \$20,000.00 to use to help fund his Chapter 13 Plan, and ongoing mortgage payments.
16. The Debtor is willing to commit to the Plan any non-exempt equity out of said funds, as added assurance of his good faith.
17. Lastly the Debtor has is under the belief that he has very little unsecured debt, and this Plan will focus on curing the arrears on his first mortgage.

WHEREFORE, the Debtor humbly requests that this Court grant his Motion to Impose the Automatic Stay pursuant to Section 362(c)(4).

Dated: September 15, 2017

/s/Brad J. Sadek, Esq
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